

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

August 25, 1999

Mr. Jerry Robinson  
Vice President Communications, Paper  
Georgia-Pacific Corporation  
P.O. Box 3333  
Crossett, AR 71635

**CPF No. 27513M**

Dear Mr. Robinson,

On October 14 and 15, 1997, a representative of the Southern Region, Office of Pipeline Safety, pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Georgia Pacific's (GP) transmission pipeline records at Crossett, AR.

As a result of a subsequent (to the inspection) review of your December 3, 1997 revised operating and maintenance procedures, the requirements for which are set forth in section 192.605, the following inadequate procedures are noted:

**1. §192.455 External corrosion control: Buried or submerged pipelines installed after July 31, 1971.**

**(a) Except as provided in paragraphs (b), (c), and (f) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:**

**(1) It must have an external protective coating meeting the requirements of §192.461.**

G-P's procedures do not require pipe installed to replace damaged or corroded pipe to have an external protective coating meeting the requirements of §192.461.

**2. §192.614 Damage prevention program.**

**(b) The damage prevention program required by paragraph (a) of this section must, at a minimum:**

**(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.**

**(2) Provide for notification of the public in the vicinity of the pipeline and actual notification of the persons identified in paragraph (b)(1) of the following as often as needed to make them aware of the damage prevention program:**

**(I) The program's existence and purpose; and**

**(ii) How to learn the location of underground pipelines before excavation activities are begun.**

G-P's procedures do not address the requirements of **§192.614(b)** to identify persons who normally engage in excavation activities in the area in which the pipeline is located, and to provide for actual notification of such persons as often as needed to make them aware of the program's existence and purpose, and how to learn the location of your underground pipeline before excavation activities are begun.

**3. §192.614 Damage prevention program.**

**(6). Provide as follows for inspection of pipelines that an operator has reason to believe could be damaged by excavation activities:**

**(I) The inspection must be done as frequently as necessary during and after the activities to verify the integrity of the pipeline; and**

G-P's procedures do not address the requirement to provide for inspections as frequently as necessary to verify the integrity of the pipeline after excavation activities, where there is reason to believe the pipeline could have been damaged.

As provided in 49 C.F.R §190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans are adequate. The criteria used in making this determination are outlined in 49 C.F.R §190.237. If you do not wish to contest this notice, please provide your revised procedures within 45 days of receipt of this notice.

(See enclosure to this notice.)

Should you have any questions regarding this notice of amendment please make reference to CPF 27513M

Sincerely,

Frederick A. Joyner  
Director, Southern Region  
Office of Pipeline Safety

Encl  
cc: Compliance Registry, OPS Headquarters

DREA/sd/DPS-25-12/21/97  
FILE: CPF 17513M/Georgia-Pacific Corporation  
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cc: DPS-20.1, Regions, Dallas

### Notice of Amendment

You are to amend the procedure manual required by 192.605 as follows:

1. Revise your procedures to require pipe that is installed to replace damaged or corroded pipe, to have an external protective coating meeting the requirements of §192.461, as required of §192.455(a)(1).
2. Revise your Damage Prevention Program to:
  - a) require identification of persons who normally engage in excavation activities in the area in which your pipeline is located, and to provide for actual notification of such persons as often as needed to make them aware of the program's existence and purpose, and how to learn the location of your pipeline before excavation activities are begun, as required of §192.614(b); and
  - b) provide for inspections as frequently as necessary to verify the integrity of the pipeline after excavation activities, where there is reason to believe the pipeline could have been damaged, as required of §192.614(6)(I).

Upon completion of the procedure please send a copy to this office for review and approval within 45 days of the receipt of this letter.